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Attorneys for Defendants the United States of America and James Richard Perry
("Federal Defendants")

**THE UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

ANDREA OLSON, an individual

Plaintiff,

v.

UNITED STATES OF AMERICA, by
and through the Department of Energy
and Bonneville Power Administration;
and **JAMES RICHARD PERRY**,
Secretary of the Department of Energy,

Defendants.

Case No. 3:15-cv-02216-HZ

**UNOPPOSED MOTION FOR
EXTENSION OF DISCOVERY
DEADLINE**

Defendants the United States of America and James Richard Perry

(collectively, "Federal Defendants"), by Billy J. Williams, United States Attorney for

the District of Oregon, and through James E. Cox, Jr., Assistant United States Attorney for the District of Oregon, respectfully move for a thirty day extension to the discovery deadline, from October 2, 2017 to November 1, 2017. This motion is based on the accompanying declaration of James E. Cox, Jr. and all pleadings of record herein. Pursuant to Local Rule 7-1, undersigned counsel conferred with the pro se Plaintiff and one of her power of attorneys ("POA"). Plaintiff's POA has informed counsel that Plaintiff does not oppose this motion.

Plaintiff Andrea Olson filed an amended complaint in March 2017 which added the United States of America and the Secretary of Energy as Defendants in this case based on alleged violations of the Family and Medical Leave Act. (ECF 56.) In July 2017, the Court set a case schedule that included a discovery cut-off of October 2, 2017. (ECF 87.)

Undersigned counsel for Defendants was on a lengthy paternity leave until August 26, 2017. (Declaration of James E. Cox, Jr. ¶ 2.) Because of this absence, counsel was unable to complete the necessary preparation to hold Plaintiff's deposition in the case in September 2017, as contemplated by the current case schedule. (*Id.*) In the past week, undersigned counsel has been in touch with Plaintiff and one of her power of attorneys regarding the possibility of scheduling Plaintiff's deposition in October 2017. (*Id.* at ¶ 3.) A thirty day extension of the current discovery deadline to November 1, 2017, would assist in allowing this deposition to occur. (*Id.*) Furthermore, an extension would not result in any delay in trial or other pre-trial deadlines, as the deadline for dispositive motions is not until December 4, 2017. (ECF 87.)

WHEREFORE, Federal Defendants respectfully request that the Court grant this unopposed motion to extend the discovery deadline in this case from October 2, 2017 to November 1, 2017.

Dated this 2nd day of October 2017.

Respectfully Submitted,

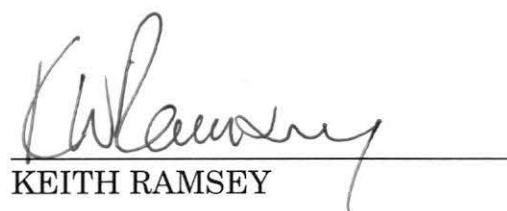
BILLY J. WILLIAMS
United States Attorney
District of Oregon

/s/ James E. Cox, Jr.
JAMES E. COX, JR.
Assistant United States Attorney
Attorneys for Federal Defendants

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **Unopposed Motion for Extension of Discovery Deadline** was placed in a postage prepaid envelope and deposited in the United States Mail at Portland, Oregon, on October 2, 2017, addressed to:

Andrea Olson
3404 SW Comus St.
Portland, OR 97219



KEITH RAMSEY

A handwritten signature in black ink, appearing to read "Keith Ramsey", is written over a horizontal line. Below the line, the name "KEITH RAMSEY" is printed in a standard sans-serif font.